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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

UNITED STATES OF AMERICA

3:16-CR-00051-BR

v.

AMMON BUNDY, et al.,

Defendants.

**GOVERNMENT'S MOTION FOR
ORDER PERMITTING THE
GOVERNMENT TO FILE
UNDER SEAL AND *EX PARTE*
THE DECLARATION OF
AUSA PAMALA R. HOLSINGER
IN SUPPORT OF THE GOVERNMENT'S
OPPOSITION TO DEFENDANT'S
MOTION TO COMPEL PRODUCTION
OF THE INVESTIGATION OF FBI
USE OF FORCE AND COVER-UP
IN THE FINICUM SHOOTING**

The United States of America, by Billy J. Williams, United States Attorney for the
District of Oregon, through Ethan D. Knight, Geoffrey A. Barrow, Craig J. Gabriel,

Charles F. Gorder, Jr. and Pamala R. Holsinger, Assistant United States Attorneys (AUSAs), moves this Court for an order permitting the government to file under seal and *ex parte* AUSA Pamala R. Holsinger's declaration. The declaration concerns an ongoing investigation by the United States Department of Justice, Office of Inspector General and will be filed in support of the government's Opposition to Defendants' Motion to Compel Production of the Investigation of FBI Use of Force and Cover-Up in the Finicum Shooting filed by Defendant Fry on behalf of all defendants (ECF No. 700).

Per Olson, attorney for Defendant David Fry, and on behalf of all other defendants, opposes this motion.

Dated this 22nd day of June 2016.

Respectfully submitted,

BILLY J. WILLIAMS
United States Attorney

s/ Charles F. Gorder, Jr.
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